

McKool Smith

 PRYOR CASHMAN LLP

November 8, 2024

By ECF

The Honorable Gabriel W. Gorenstein
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Courtroom 6B
New York, New York 10007-1312

MEMORANDUM ENDORSED

Re: Marc Restellini v. The Wildenstein Plattner Institute, Inc.
20 Civ. 4388 (AT) (GWG)

Dear Judge Gorenstein:

This is a joint letter submitted on behalf of all parties.

On June 28, 2024, the parties reported to the Court that they were making substantial progress towards a settlement agreement. At their request, the Court continued the stay of all deadlines and have permitted the parties additional time to continue their settlement discussions on multiple occasions, most recently through November 8. *See* ECF No. 178-179, 183, 185, 187. The Court also adjourned *sine die* a conference that had been scheduled before it. ECF No. 180-181.

The parties have made very substantial progress in drafting a settlement agreement. They have done so, in part, with the involvement of the mediator that they retained to facilitate their settlement discussions. The parties are close to having a final settlement agreement. The parties continue to make progress, but including because of the volume of materials at issue and the participation of overseas counsel, seek additional time to finalize a settlement.

Accordingly, the parties jointly request that the Court continue the stay previously ordered until December 20, 2024, to permit the parties to finalize their settlement agreement.

Respectfully submitted,

PRYOR CASHMAN LLP

/s/ William L. Charron

By:

William L. Charron
Daniel V. Derby
Attorneys for Defendants
Wildenstein Plattner Institute, Inc. and
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McKool Smith P.C.

/s/ Daniel W. Levy

By:

Daniel W. Levy
Eliza Beeney
Attorneys for Plaintiff Marc Restellini

Granted. Report due December 20, 2024.

So Ordered.



GABRIEL W. GORENSTEIN

United States Magistrate Judge

November 12, 2024